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Counsel for Official Committee of Tort Claimants

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

-and-

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors

- ☐ Affects PG& E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

**All papers shall be filed in the Lead Case,
No. 19-30088 (DM)*

Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**DECLARATION OF JOSEPH M.
ESMONT IN SUPPORT OF THE
MOTION OF THE OFFICIAL
COMMITTEE OF TORT CLAIMANTS
FOR AN ORDER DETERMINING
PROCEDURES FOR PRESERVING
JURY TRIAL RIGHTS**

1 I, Joseph M. Esmont, declare the following under penalty of perjury pursuant to 28 U.S.C.
2 section 1746:

3 1. I submit this declaration in support of the motion of the Official Committee of Tort
4 Claimants for entry of an order shortening time for a hearing on the motion for entry of an order
5 determining procedures for jury trial rights (the "**Jury Trial Motion**"). I have personal knowledge
6 of the facts set forth in this declaration.

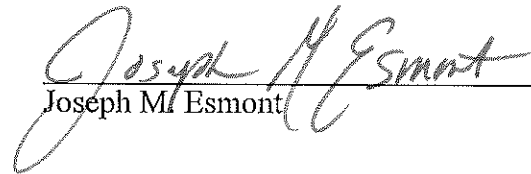
7 2. I am a member of the State Bar of Ohio and a counsel at Baker & Hostetler LLP. I
8 am admitted pro hac vice to this Court.

9 3. On August 7, 2019, I asked Mr. Orsini by email whether the Debtors would consent
10 to the relief requested in the Jury Trial Motion; on August 8, 2019, Mr. Orsini indicated the Debtors
11 would not consent.

12 4. On August 8, 2019, at 1:17 Pacific time, I asked Mr. Orsini by email whether the
13 Debtors would consent to the Motion to Shorten Time, and I requested a response by 4:00 p.m.
14 Pacific time. As of 4:30 p.m. Pacific time, Mr. Orsini had not yet responded.

15
16 I declare under penalty of perjury under the laws of the United States of America that the foregoing
17 is true and correct.

18 Executed on August 8, 2019.
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22 Joseph M. Esmont
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